

EXHIBIT A

VENEZUELA PARTIES' PROPOSED ALTERNATIVE SCHEDULE

Event	Special Master's Proposed Deadline	VPs Alternative Deadline
Deadline for the Special Master to submit his Final Recommendation	Wednesday, July 2 ("Rec")	Wednesday, July 2 [with any SM witness declarations]
Deadline to serve written discovery on the party (or parties) whose bid is selected as the Final Recommendation	Monday, July 7 (Rec + 5 days)	Monday, July 7
Opening expert reports due	Monday, July 7 (Rec + 5 days)	Monday, July 7
Deadline for the filing of any notice and brief description of objections to the Special Master's Final Recommendation		Monday, July 7
Deadline for the filing of any objections to the Special Master's Final Recommendation	Wednesday, July 9 (Rec + 7 days)	
Deadline for any Competing Objector to disclose its own bid materials (such materials to be commensurate with those disclosed by the Special Master of the recommended bid) ¹	Wednesday, July 9 (Rec + 7 days)	Monday, July 7
Deadline to serve written discovery on a Competing Objector	Friday, July 11 (Rec + 9 days)	Wednesday, July 9
Deadline to serve responses and objections for discovery requests served after the Final Recommendation	Tuesday, July 15 (Rec + 13 days)	Friday, July 11
Deadline to meet and confer regarding the scope of discovery to be produced in response to discovery requests served after submission of the Final Recommendation	Wednesday, July 16 (Rec + 14 days)	Monday, July 14

¹ A Competing Objector is any party objecting to the Final Recommendation on the basis that its bid should have been selected as the Final Recommendation instead.

Event	Special Master's Proposed Deadline	VPs Alternative Deadline
Deadline to serve witness disclosures pursuant to FRCP 26(a)(3)	Friday, July 18 (Rec + 16 days)	Monday, July 14
Deadline to notice witness depositions	Monday, July 21 (Rec + 19 days)	Tuesday, July 15
Deadline to complete document productions in response to discovery requests served before the submission of the Final Recommendation		Tuesday, July 15
Deadline to serve responsive expert reports	Monday, July 21 (Rec + 19 days)	Thursday, July 17
Deadline to complete document productions in response to discovery requests served before the submission of the Final Recommendation and substantially complete document productions in response to discovery requests served after the submission of the Final Recommendation	Tuesday, July 22 (Rec + 20 days)	[split into separate deadlines]
Deadline to complete document productions in response to discovery requests served after the submission of the Final Recommendation		Friday, July 18
Deadline to serve reply expert reports, if any	Friday, July 25 (Rec + 23 days)	Monday, July 21
Conclusion of the discovery period	Thursday, July 31 (Rec + 29 days)	Monday, July 23
Deadline for the filing of any objections to the Special Master's Final Recommendation, with exhibits objecting party proposes to introduce into evidence		Tuesday, July 28
Deadline for the filing of responses to objections to the Special Master's Final Recommendation, with exhibits responding party proposes to introduce into evidence	Friday, August 1 (Rec + 30 days)	Wednesday, August 6

Event	Special Master's Proposed Deadline	VPs Alternative Deadline
and objections to exhibits of objecting party		
Deadline for the filing of replies regarding any objections to the Special Master's Final Recommendation, with objections to responding party's exhibits	Friday, August 8 (Rec + 37 days)	Wednesday, August 13
Deadline for the filing of sur-replies to replies regarding any objections to the Special Master's Final Recommendation (only to the extent new arguments are raised in reply briefing)	Tuesday, August 12 (Rec + 41 days)	
Deadline for the Special Master to submit Joint Status Report ²	Tuesday, August 12 (Rec + 41 days)	Thursday, August 14
Deadline to disclose exhibits pursuant to FRCP 26(a)(3)	Tuesday, August 12 (Rec + 41 days)	[combined with substantive briefs]
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	Thursday, August 14 (Rec + 43 days)	[combined with substantive briefs]
Commencement of the Sale Hearing	Monday, August 18 (Rec + 47 days)	Monday, August 18

² The Court previously ordered that the Special Master's Joint Status Report should include a witness list and allocation of time across parties. D.I. 1741 ¶ 3.